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*Attorneys for Defendant Nevada Resort Association -  
IATSE Retirement Local 720 Pension Plan*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DAWN WOLGAST, an individual,

Plaintiff,

v.

THEATRICAL STAGE EMPLOYEES LOCAL 720  
PENSION PLAN

Defendant.

CASE NO.: 2:19-cv-00083-JCM-GWF

**STATEMENT REGARDING  
REMOVAL**

Defendant Nevada Resort Association - IATSE Retirement Local 720 Pension Plan (the “Plan”) (incorrectly named as the Theatrical Stage Employees Local 720 Pension Plan) respectfully submits this Statement Regarding Removal pursuant to the Court’s January 14, 2019, Minute Order:

1. On December 28, 2018, Plaintiff Dawn Wolgast (“Wolgast”), served a Small Claims Complaint on the Plan in the Justice Court, Clark County, Nevada, entitled *Wolgast v. Theatrical Stage Employees Local 720 Pension Plan*, Case No. 18A004252 (the “Small Claims Action”).

2. On December 28, 2018, Plaintiff Dawn Wolgast (“Wolgast”), also served a summons on the Plan in the Small Claims Action.

3. The removal is not based on diversity jurisdiction.

4. The notice of removal was not filed more than thirty (30) days after receiving a copy of the summons and complaint.

5. The Small Claims Action has been pending for less than a year.

6. The Plan is the only defendant in this matter.

Dated this 22th day of January, 2019. BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: /s/ Christopher M. Humes

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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on January 22, 2019, I served a true copy of the foregoing **STATEMENT REGARDING REMOVAL** via:

☒ a. **CM/ECF System**

☒ b. **U.S. Mail** in a sealed envelope(s) mailed with postage thereon fully prepaid upon:

Dawn Wolgast  
5573 Golden Palms Court  
Las Vegas, Nevada 89148

*Plaintiff Dawn Wolgast*

**I declare under penalty of perjury that the foregoing is true and correct.**

/s/ Ebony Davis

An Employee of Brownstein Hyatt Farber Schreck, LLP